

February 8, 2022

The Honorable C. T. Wilson
Chair
Economic Matters Committee

The Honorable Brian M. Crosby
Vice-Chair
Economic Matters Committee

RE: AMEND HB 108 - Public Utilities - Energy Efficiency and Conservation Programs - Energy Performance Targets and Low-Income Housing

Dear Delegate Wilson and Delegate Crosby,

The Polyisocyanurate Insulation Manufacturers Association writes in support of Maryland's efforts to increase building energy efficiency targets, especially for the low-income housing sector. In order to accomplish this goal, **we urge the Committee to amend HB 108 and strike Section (B)(5), Part 2.** The specific amendment we propose is included on page 2 of this letter.

As written, Section (B)(5) would restrict the use of widely available materials such as polyisocyanurate (polyiso) insulation that are installed across the building and construction sector to improve building energy efficiency performance. Polyiso insulation is manufactured in controlled environments and is shipped to jobsites as a fully cured material. Section (B)(5) would restrict the use of polyiso insulation for weatherization projects without any meaningful benefit to construction workers or building occupants. The proposed restriction appears to be based on a misunderstanding of how certain raw materials are used *and* consumed within the manufacturing process for polyiso insulation. As a result, the restriction would limit the choices that weatherization professionals and homeowners have when it comes to insulation products for their projects and homes.

The use of polyiso insulation provides other environmental benefits in addition to enhanced energy savings. The product is manufactured with low-global warming potential blowing agents and the product's embodied carbon compares favorably to other insulation options. The environmental profiles of polyiso insulation products are confirmed through the publication of third-party verified Environmental Product Declarations available here: <https://www.polyiso.org/page/EPDs>.

Additionally, the polyiso insulation industry creates local manufacturing jobs through the operation of both raw material and polyiso product sites in Maryland. The impact of Section (B)(5)'s restrictions on the use of polyiso insulation would of course decrease demand for products manufactured in the State.

Therefore, we respectfully request that the Committee amend HB 108 and strike Section (B)(5), Part 2 from the proposed legislation. This amendment would remove an unnecessary provision in the bill and help Maryland achieve its notable goals of increased building energy efficiency.

Sincerely,



Justin Koscher
President

Amend HB 108 Section (B)(5) as follows:

(B)(5) (I) SUBJECT TO SUBPARAGRAPH (II) OF THIS PARAGRAPH, THE PROGRAMS AND SERVICES PROVIDED UNDER PARAGRAPH (1) OF THIS SUBSECTION MAY NOT USE THERMAL INSULATING MATERIALS FOR BUILDING ELEMENTS, INCLUDING WALLS, FLOORS, CEILINGS, ATTICS, AND ROOF INSULATION, THAT IN THEIR FINAL FORM CONTAIN AND CAN EXPOSE RESIDENCES TO:

1. FORMALDEHYDE; OR

~~2. ANY SUBSTANCE THAT IS A CATEGORY 1 RESPIRATORY SENSITIZER AS DEFINED IN 29 C.F.R. PART 1910 (APPENDIX A).~~